

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION

Antonia DeNicola,

Plaintiff,

v.

**Town of Ridgeland, South Carolina
and Ridgeland Police Department,**

Defendants.

CIVIL ACTION NO.

9:12-CV-2690-SB-BM

**PLAINTIFF'S ANSWERS TO RULE
26.01 INTERROGATORIES**

THE PLAINTIFF, ANSWERING THE RULE 26.01 INTERROGATORIES
propounded by the Court, would state as follows:

Interrogatory (A)

State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

Response to Interrogatory (A):

None.

Interrogatory (B)

As to each claim, state whether it should be tried jury or nonjury and why.

Response to Interrogatory (B):

Jury.

Interrogatory (C)

State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the

outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

Response to Interrogatory (C):

The Plaintiff is an individual.

Interrogatory (D)

State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

Response to Interrogatory (D):

This Court has federal question jurisdiction pursuant to 42 U.S.C.A. §1981 and §1982; 42 U.S.C.A. §2000e-2(a)(1) (Sex Discrimination and Workplace Harassment) and Title VII, 42 U.S.C.A. §2000e-3 (Retaliatory Discharge and Treatment), and Civil Rights Act of 1964, § 703 and 704. Venue in this district is proper as Defendants are governmental entities doing business in this district, and all relevant facts occurred in this district.

Interrogatory (E)

Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

Response to Interrogatory (E):

No.

Interrogatory (F)

[Defendants only.] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

Response to Interrogatory (F):

Not applicable.

Interrogatory (G)

[Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

Response to Interrogatory (G):

Not applicable.

HARVEY & BATTEY, P.A.

By: /s/ WILLIAM B. HARVEY, III
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Dated: September 18, 2012